

REMARKS

Claims 1-288 are pending in the present application. Claims 1 and 145 are independent claims.

Discussion of Applicants' Embodied Invention

In a conventional art, generally a document generation software includes a printer driver software. In conventional printer drivers, the printer driver software translates the document from its application-specific source document format into a format suitable for a specific printer. For example, upon creating a document with MS Word, one can save the document for further editing in its application-specific source document format. This format is recognizable by, e.g., its .doc extension.

To print the document, the user who is working in the Word application selects the "print" button from the screen menu. The printer driver is then activated to select a printer (most of the time the default printer is automatically selected) and the printer driver converts the document/file from the Word format into a format suitable for the selected printer.

A problem with such a conventional system, however, is that the printer driver needs to be updated whenever the status of the printers changes. For instance, when a new printer is made available for printing, the printer driver needs to be updated to add the new printer information therein, so that the

printer driver can transform the Word format to the format necessary for the newly added printer, if the new printer is to be used.

Applicant's embodied invention overcomes this problem by providing a *document generator* (e.g., the PC with the Word application running) with a driver that just transforms all inputted data streams of various initial formats to one device independent format. Therefore, the driver software is much more easy to handle. No updates to the driver software are necessary when a new printer is added to the system. And a variety of converters are not needed at the PC site for all printers that a user uses now and then.

To make this work, in Applicants' invention, along with the above-described document generator, a server is needed that is able to transform the device independent format delivered by the driver according to the invention into a device specific format. A localization of transformation of the format in a server makes the system to be more manageable. In case a new printer is added, this transformation has to be installed only in the server, and not in the numerous PCs, where most of the time it has to be done by the unskilled PC user. Thus, Applicants' invention provides an effective and useful document delivering system.

35 U.S.C. § 103 Rejections

Claims 1-288 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Suzuki et al.* (U.S. Patent No. 6,213,652) in view of *Goertz et*

al. (U.S. Patent No. 6,173,295) and further in view of *Guck* (U.S. Patent No. 5,911,776). This rejection is respectfully traversed.

Suzuki et al. states on col. 3, lines 39-43 that a print server converts the print format of received print data to another print format if a printer connected to the print server cannot interpret the received data. Similarly, in *Guck* (which the Examiner relied on for teaching the claimed document generator), it is the printer server 50 that converts the document into a format that is compatible with the designated client device, if the client device cannot handle the initial format of the document.

In clear contrast, in Applicants' claimed invention, it is the *document generator* that translates an input data stream into a data stream having a device independent format, as required by independent claims 1 and 145. Then a computer (e.g., server 13 in Fig. 1) translates this device independent data stream into a device specific data stream for the determined best output device, as required by claims 1 and 145. This configuration provides advantages that are discussed above in the Discussion of Applicants' Embodied Invention section.

Furthermore, *Goertz et al.* does not overcome these deficiencies of *Suzuki et al.* and *Guck*, taken singularly or in combination, because *Goertz et al.* is also directed to a printer server configured to select an appropriate printer and has nothing to do with a document generator that translates the input data stream into a device independent data stream, as in the claims.

Therefore, even if the references are combinable, assuming *arguendo*, the combination of the references would still fail to disclose or suggest the above-noted features as recited in claims 1 and 145.

Concerning *Guck*, the Examiner's statement is that, since a source document can be converted to any device specific format, the document is (print) device independent. However, there are numerous different applications that generate documents, where each application has its application-specific source document format. Therefore, the use of such a print device independent source format is not advantageous, since multiple converters are necessary.

Accordingly, independent claims 1 and 145 and their dependent claims (due their dependency) are patentable over the applied references, and reconsideration and withdrawal of the rejection based on these reasons is respectfully requested.

CONCLUSION

For the foregoing reasons, Applicants respectfully request the Examiner to reconsider and withdraw the rejections of record, and earnestly solicit an early issuance of a Notice of Allowance.

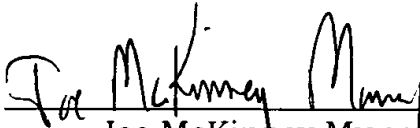
The Examiner is respectfully requested to enter this Response After Final Rejection, in that it raises no new issues and/or it reduces the issues for appeal.

Should there be any matters which need to be resolved in the present application, the Examiner is respectfully requested to contact Esther H. Chong (Registration No. 40,953) at the telephone number of the undersigned below.

If necessary, the Commissioner is hereby authorized in this, concurrent, and further replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

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